

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

MUR: No. 04-0073

STATEMENT OF REASONS OF EXTERNAL INVESTIGATIVE CONSULTANT

On behalf of the Citizens Clean Elections Commission (“Commission”), the External Investigative Consultant hereby provides the Statement of Reasons showing no reason to believe violations of the Citizens Clean Elections Act (“Act”) and Commission rules have occurred.

I. Procedural Background

On May 9, 2005, Patrick Meyers (“Complainant”) filed a complaint against Leah Landrum, a participating candidate for State Representative, District 16, (“Respondent”) alleging four violations of the Act by Respondent. Exhibit A. On May 26, 2005, Respondent made her initial response to the complaint and provided supporting documentation and explanation for her expenditures. Exhibit B. In August, the Commission received Respondent’s amended campaign finance report for the 2004 election cycle. Exhibit C.

II. Alleged Violations

First, Complainant asserts that a payment by Respondent to Robert Landrum to reimburse for the purchase of a Democratic Voter File List violated the \$110.00 limit on petty cash expenditures. However, Respondent has established that the reimbursement was not made from petty cash, and I can find no violation of the Act or Commission rules that occurred over this expenditure.

Second, Complainant asserts that Respondent made a \$250.00 contribution to a charity, violating the Commission rule precluding use of campaign funds for donations. A.A.C. R2-20-702(C)(3)(g). Respondent has established that the expenditure is one of those permitted by A.A.C. R2-20-702(B); a payment to a civic organization reasonable in relation to the value received, and has amended her campaign finance report accordingly. Therefore, I find no violation of the Act or Commission rules.

Third, Complainant asserts that a payment to Eiverness Consulting Group, Ltd., was a payment to a middleman and not a vendor; however, Respondent has furnished clear and convincing evidence to the contrary. I find no violation of the Act occurred, as alleged.

Finally, Complainant alleges that a payment to Mountain Graphics and Design, LLC, for printing was not timely reported. The payment appeared in the proper

campaign finance report and has been satisfactorily explained by Respondent. Thus, again I find no violation of the Act occurred.

III. Finding

Based upon the Complaint, Respondent's response, the amended campaign finance report and the results of the staff study, the External Investigative Consultant recommends that the Commission find no reason to believe violations of the Act or Commission rules occurred and dismiss the Complaint.

Dated this 17th day of August, 2005

By: _____
L. Gene Lemon
External Investigative Consultant